

AFFIDAVIT

I, Jack A. Vickery, a Special Agent for the Federal Bureau of Investigations (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent with the FBI, and has been so employed for twelve years. Prior to being employed by the FBI, I was a sworn law enforcement officer in the State of Georgia for approximately seven years. As an FBI Special Agent, I am currently assigned to the FBI Cleveland Division, Akron Resident Agency. My employment has vested me with the authority to investigate violations of federal laws, including Identity Theft as cited under Title 18, United States Code, Section 1028(a)(7), Aggravated Identity Theft cited under Title 18, United States Code, Section 1028A and bank fraud as cited under Title 18, United States Code, Section 1344.

2. This Affidavit is being made in support of an application for a complaint and arrest warrant for DANTE GABRIEL DIXON, DOB January XX, 1968, who I believe, based on the information herein, committed Identity Theft in violation of 18 U.S.C. § 1028(a)(7), Aggravated Identity Theft in violation of 18 U.S.C. § 1028A and Bank Fraud in violation of 18 U.S.C. § 1344. I know the following information based on investigation conducted by Detective Paul Hooper with the Akron Police Department, which also includes statements made by VICTIMS 1 and 2.

VICTIM 1

3. In September of 2016, a temporary staffing agency placed VICTIM 1 at the Peter J. Sebastian Group located at 1799 Akron-

Peninsula Road, Akron, Ohio, in the Northern District of Ohio, for employment.

4. On September 26, 2016, VICTIM 1 filled out a complete job application for the Peter J. Sebastian Group that contained all VICTIM 1's personal identifying information, including date of birth, social security number, full name and address. VICTIM 1 worked for DANTE G. DIXON, the company owner.

5. DIXON asked VICTIM 1 if VICTIM 1 would like a company credit card to purchase incidental items for the office. VICTIM 1 agreed. VICTIM 1 received, in the mail at VICTIM 1's home, Capital One credit cards in VICTIM 1's name and DANTE DIXON'S name.

6. VICTIM 1 took the card to work at the Peter J. Sebastian Group and told DIXON that the cards showed up at VICTIM 1's home. DIXON told VICTIM 1 that the credit cards were Peter J. Sebastian Group cards. DIXON told VICTIM 1 to call Capital One and authorize the cards. VICTIM 1 did as instructed.

7. VICTIM 1 used the Capital One card issued in VICTIM 1's name to purchase a couple of small items for the Peter J. Sebastian Group at Office Max and Ace Hardware.

8. VICTIM 1 received a bill from Capital One and discovered that the business account had fraudulently been taken out in VICTIM 1's name, using VICTIM 1's personal identifying information. VICTIM 1 discovered that VICTIM 1 was being personally billed for over \$3,600 in purchases made by DANTE DIXON.

9. VICTIM 1 also discovered that DIXON had unsuccessfully applied for credit with Chase Bank and American Express also with VICTIM 1's personal identifying information. DIXON applied for a Chase Ink business credit card and an American Express credit card in VICTIM 1's name.

10. During the course of his investigation, Akron Police Detective Paul Hooper obtained records from Capital One that show a credit application for a Visa card using VICTIM 1's personal identifying information but DANTE DIXON'S contact information. The records show DIXON was added as a second card holder, again with his contact information, and transaction records of \$4,698.23 in fraudulent charges.

11. Detective Hooper also obtained photographs of DANTE DIXON receiving a \$2,000 cash advance with the Capital One credit card he obtained with VICTIM 1's means of identification at US Bank in Fairlawn, Ohio, on October 11, 2016.

12. From October 10, 2016, to October 24, 2016, DIXON rented a Mercedes E350 with the Capital One credit card he obtained with VICTIM 1's personal identifying information.

13. VICTIM 1 filed a statement with Capital One identifying all the unauthorized purchases made by DIXON.

14. Detective Hooper also obtained credit applications from JPMorgan Chase and American Express. In each instance, the applications showed that VICTIM 1's personal identifying information

was used, but the contact information provided was that of DANTE DIXON and The Peter J. Sebastian Group. In the instance of the American Express credit application, DIXON also attempted to add his mother, Sirviter DIXON, to the account.

15. Based on the above, I believe there is probable cause that DANTE DIXON committed the crimes of Identity Theft in violation of 18 U.S.C. § 1028(a)(7), Aggravated Identity Theft in violation of 18 U.S.C. § 1028A and Bank Fraud in violation of 18 U.S.C. § 1344.

VICTIM 2

16. VICTIM 2 met DANTE "DAN" DIXON through his brother Rafel Dixon. Rafel Dixon made claims to VICTIM 2 that he owned a male modeling agency. In June of 2016, VICTIM 2 contacted Rafel Dixon through Facebook. VICTIM 2 offered to take photographs for free to gain professional experience. Rafel Dixon introduced VICTIM 2 to his brother, DANTE DIXON, in October 2016. VICTIM 2 offered to take photos for Peter J. Sebastian Group. DIXON told VICTIM 2 that he was the CEO of Peter J. Sebastian Group and hosted a radio show on WAKR. In November of 2016, VICTIM 2 photographed DANTE DIXON at WAKR.

17. VICTIM 2 was hired full-time by DANTE DIXON to work for the Peter J. Sebastian Group on January 2, 2017, as a communications director and offered a salary of \$3,500 per month. VICTIM 1 was hired around the same time as another individual identified herein as "DM." Both VICTIM 2 and "DM" filled out "HR paperwork" that included all of their personal identifying information.

18. After VICTIM 2 was hired, VICTIM 2 moved from an address in Akron, Ohio, to an address on Hampton Knolls Drive, also in Akron, Ohio. VICTIM 2 notified DIXON of the address change.

19. DANTE DIXON sent VICTIM 2 and "DM" to Miami, Florida. Rafel Dixon went with them. The three were supposed to search for models for a Peter J. Sebastian Group advertising campaign. Events were scheduled at a Marriot hotel in Miami, Florida. VICTIM 2 was also aware of plans for "job fairs" in which people would fill out job applications in Florida and Ohio, and the Peter J. Sebastian Group would offer to place workers in businesses.

20. While in Miami, the paychecks issued to VICTIM 2 from the Peter J. Sebastian Group bounced. DIXON blamed the payroll company. VICTIM 2 opened a Chase Bank account in Florida at DANTE DIXON's direction because there were no Huntington Bank branches there. VICTIM 2 gave DIXON the account number so DIXON could directly deposit VICTIM 2's pay.

21. While in Florida, VICTIM 2 received an American Express card from DANTE DIXON. DIXON also had a card on the same account. DIXON told VICTIM 2 that VICTIM 2 had been added to Peter J. Sebastian Group's business account. VICTIM 2 also received a Capital One card with the same explanation from DIXON.

22. DIXON brought VICTIM 2, "DM," and Rafel Dixon back to Akron, Ohio, from Miami, Florida, because DIXON said he was not impressed with work they had been doing. They returned on February 23, 2017.

23. VICTIM 2 told DIXON that VICTIM 2 was going to lose VICTIM 2's car due to the bad Peter J. Sebastian paychecks. DIXON offered to let VICTIM 2 trade VICTIM 2's personal car in and receive a company car. VICTIM 2 traded in VICTIM 2's personal vehicle to Dave Walter BMW and received a BMW in both VICTIM 2's name and the Peter J. Sebastian Group. VICTIM 2 later learned that DANTE DIXON filled out a fraudulent credit application using VICTIM 2's personal identifying information to get the BMW. DM also received a car.

24. VICTIM 2 deposited multiple Peter J. Sebastian Group paychecks into VICTIM 2's Chase Bank account, all of which bounced. This caused VICTIM 2 to get behind in rent. VICTIM 2 also discovered that money had been taken from VICTIM 2's Chase Bank account by CashNet USA due to payday loans in default. VICTIM 2 never took out any CashNet loans and suspected that DIXON had to have obtained loans with her information.

25. VICTIM 2 obtained a copy of VICTIM 2's credit report. VICTIM 2 stated that DANTE DIXON stole her identity to get the payday loans as well as the American Express and Capital One cards. VICTIM 2 also discovered numerous other loans and credit applications on the credit report that VICTIM 2 had not previously applied for.

26. VICTIM 2 found that numerous pieces of mail had been sent to her prior address from creditors including American Express, Capital One, JPMorgan Chase, Citi/American Airlines, and Mercedes Benz Financial Services. DANTE DIXON used VICTIM 2's personal identifying

information with VICTIM 2's old address to apply for credit at all of the above listed businesses.

27. In March 2017, Detective Hooper received VICTIM 2's credit information from Capital One regarding the fraudulent account. It showed the Capital One account was opened using VICTIM 2's personal identifying information with the business name Peter J. Sebastian Consulting Group. VICTIM 2's old address in Akron, Ohio, was used. The listed contact information on the account was DANTE DIXON'S telephone number xxx-xxx-9663 and his email address: accounting@pjsgny.com. DANTE DIXON was added as an authorized user on the account after credit was secured and a card was issued in his name. Capital One reported taking a \$2,847.25 loss on 41 transactions.

28. Detective Hooper contacted American Express and requested any records regarding VICTIM 2. American Express records showed that multiple attempts were made to gain credit on various American Express cards using VICTIM 2's personal identifying information with DANTE DIXON'S telephone numbers (xxx-xxx-2424 and xxx-xxx-9663) and email addresses (info@pjsgnyc.com and dandixon@pjsgnyc.com). VICTIM 2's old address in Akron, Ohio, DIXON'S address 802 Euclid Ave in Akron, Ohio, and an address that appears to have been used by DIXON in Miami, Florida - 1111 Brickel Bay Dr., Apt. 807, Miami, Florida 33131 - were also listed. An AMEX Everyday Credit Card account was successfully opened and multiple charges from January 20, 2017, to March 1, 2017,

left a balance of \$2,017.23. Those charges include a \$1,417.69 payment to JW Marriot Hotel in Miami, Florida, on January 28, 2017.

29. Detective Hooper obtained a subpoena for Citibank. VICTIM 2 showed him a letter sent to her at her old address in Akron, Ohio, regarding the application for a Citi - American Airlines credit card. Citi responded with credit application data that showed credit applied for using VICTIM 2's name and personal identifying information, but Dixon's telephone number xxx-xxx-6625. The credit application was denied.

30. VICTIM 2 showed Detective Hooper letters sent to her old address from Mercedes Benz Financial Services (MBFS). Detective Hooper obtained a subpoena for records from MBFS regarding VICTIM 2 and received records that showed that DIXON attempted to purchase and finance a 2017 Mercedes E300 for \$55,500 and a 2016 Mercedes C300 for \$42,492 using VICTIM 2's identifying information and old address. VICTIM 2 was listed as a co-buyer along with the business Peter J. Sebastian Group, and the contact information was DIXON's telephone number xxx-xxx-9663. The credit applications were declined by MBFS.

31. VICTIM 2 had money taken from VICTIM 2's Chase Bank account by CashNet USA. VICTIM 2 suspected that DIXON got a payday loan in VICTIM 2's name and the money taken from VICTIM 2's Chase Bank account was for repayment of the fraudulent loan. VICTIM 2 believes the loan money was deposited in VICTIM 2's checking account by DIXON as VICTIM 2's pay from Peter J. Sebastian.

32. Detective Hooper obtained a subpoena to request any credit data regarding VICTIM 2 at CashNet USA. CashNet responded with records that showed two \$700 loans were obtained. The dates were February 21, 2017, and March 1, 2017.

33. The CashNet USA account showed that the loans were obtained with VICTIM 2's personal identifying information and old address, but DIXON'S telephone number (xxx-xxx-0975) and the email address [VICTIM2]@strategiclifechurch.com. VICTIM 2 never had that email address. VICTIM 2 provided CashNet USA with a legitimate email address when she reported the fraud.

34. In June of 2017, Detective Hooper obtained a subpoena and requested records from 1&1 Internet, Inc. (1&1) regarding peterjsebastiongroup.com and pjsgnyc.com. 1&1 responded with records that showed the domain names were purchased in the name of Sirviter Dixon (DANTE DIXON'S mother) at 802 Euclid Ave, Akron, Ohio, in the Northern District of Ohio - DIXON'S address. The services were purchased with the Capital One credit card that DIXON obtained using VICTIM 2's means of identification. Multiple domains and email addresses were registered on this account including, but not limited to, "@pjsgnyc.com," "peterjsebastiongroup.com," and "@strategiclifechurch.com."

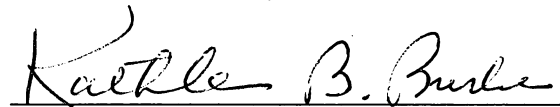
35. I know that Capital One Bank, American Express, J.P. Morgan Chase Bank and US Bank are financial institutions which are FDIC insured.

36. Based on the foregoing, I respectfully submit that there is probable cause to establish that from on or about September 26, 2016, through March 2017, DANTE GABRIEL DIXON, without lawful authority, knowingly transferred, possessed, or used one or more means of personal identifying information for VICTIM 1 and VICTIM 2 referenced herein to commit the crimes of: Identity Theft in violation of 18 U.S.C. § 1028(a)(7), Bank Fraud in violation of 18 U.S.C. § 1344, and Aggravated Identity Theft in violation of 18 U.S.C. § 1028A. Said violations occurred in the Northern District of Ohio, Eastern Division.



Jack A. Vickery
Special Agent
Federal Bureau of Investigation
Akron, Ohio

Subscribed and sworn to before me this 28th day of September, 2018.



Kathleen B. Burke
U.S. Magistrate Judge